

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MARIBEL MOSES, on behalf of herself and all  
others similar situated,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY,  
d/b/a *The New York Times*,

Defendant.

Civil Action No. 1:20-cv-4658-RA

**DEFENDANT THE NEW YORK  
TIMES COMPANY’S NOTICE OF  
MOTION AND MOTION TO  
DISMISS PLAINTIFF’S FIRST  
AMENDED CLASS ACTION  
COMPLAINT**

Hon. Judge Ronnie Abrams

Notice is hereby given that The New York Times Company’s (“NYT”) respectfully moves, pursuant to Fed. R. Civ. P. 12(b)(6), for dismissal with prejudice of all claims asserted in Plaintiff’s First Amended Class Action Complaint because they fail to state claims upon which relief can be granted.

This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities and Request for Judicial Notice filed concurrently herewith, the pleadings and papers filed herein, the declaration of Kristen Rodriguez filed concurrently and in support of this Motion, and upon such other and further matters as may be presented to the Court.

[SIGNATURES ON THE FOLLOWING PAGE]

Dated: September 21, 2020

Respectfully submitted,

DENTONS US LLP

By: /s/ Sandra D. Hauser

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*Attorneys for Defendant,  
The New York Times Company*

**CERTIFICATE OF SERVICE**

I certify that on September 21, 2020 I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Sandra Hauser